

**Hand Delivered**

December 12, 2003

Mr. Thomas Manning  
U.S. Environmental Protection Agency, Region 5  
Mail Code: DW-8J  
77 West Jackson Blvd.  
Chicago, IL 60604-3511

**RECEIVED**

**DEC 16 2003**

U.S. E.P.A.  
N.W.D.O.

**Re:   Envirosafe Services of Ohio, Inc.**  
      **EPA Identification Number: OHD 045 243 706**  
      **Response to RFI Phase I Report and Phase II Work Plan NOD**

Dear Mr. Manning:

In accordance with the approved Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan dated February 28, 2002, Envirosafe Services of Ohio, Inc. (ESOI) submitted a Phase I Report and Phase II Work Plan to the U.S. Environmental Protection Agency (USEPA) on July 18, 2003.

On October 23, 2003, ESOI received a Notice of Deficiency (NOD), dated October 20, 2003, from the USEPA regarding the RFI Phase I Report and Phase II Work Plan. During the review of the comments contained in the NOD ESOI was informed that USEPA intended to accelerate the Phase II investigation for the area west of Solid Waste Management Unit (SWMU) 5. So to proceed without delay, ESOI focused its review on the comments pertaining to this area and submitted a response to comments associated with it on November 21, 2003.

Since that time a detailed review of the data referenced in all NOD comments and other related information generated during the preparation of the approved RFI Work Plan has been conducted to evaluate the background for these comments, potential significance of these comments relative to the ultimate corrective measures for the site, and to develop a sound basis for all responses. Enclosed in this submittal are the results of that review in the form of a response to all comments in the NOD.

Should you have any questions, please do not hesitate to contact Stephen DeLussa of my staff at (215) 659-2001 ext. 15.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and

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belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas E. Roberts", with a long horizontal flourish extending to the right.

Douglas E. Roberts  
President

enclosure

cc: Lynn Ackerson OEPA/NWDO  
John Pasquarette, OEPA/NWDO  
Ed Lim, OEPA/CO  
Sandy Bauer, (Document Depository)

Stephen DeLussa, ETI  
Mark Nielsen, ENVIRON  
Mike Momenee, MSG